

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

United States of America and States of the United States,
Ex rel. Patrick Donohue,

Plaintiffs,

- against -

CASE NO.: 1:20-CV-5396 (GHW)

RICHARD CARRANZA, in his official capacity as
the former Chancellor of New York City Department of
Education,
MEISHA PORTER, in her official capacity as the current
Chancellor of the New York City Department of Education,
NEW YORK CITY DEPARTMENT OF EDUCATION,
NIAGARA FALLS PUBLIC SCHOOL DISTRICT,
MARK LAURRIE, in his official capacity as Superintendent,
BUFFALO PUBLIC SCHOOL DISTRICT,
KRINER CASH, in his official capacity as Superintendent,
MASSACHUSETTS DEPARTMENT OF EDUCATION,
SOMERVILLE PUBLIC SCHOOL DISTRICT,
MARY SKIPPER, in her official capacity as Superintendent,
JEFFREY C. RILEY, in his official capacity
as Superintendent,
STAMFORD PUBLIC SCHOOL DISTRICT,
DR. TAMU LUCERO, in her official capacity
as Superintendent,
CHICAGO PUBLIC SCHOOL DISTRICT,
JOSE M. TORRES, PhD, in his official capacity
as Superintendent,
LOUDOUN COUNTY PUBLIC SCHOOL DISTRICT,
SCOTT A. ZIEGLER, in his official capacity as
Superintendent,
CAMDEN CITY PUBLIC SCHOOL DISTRICT,
KATRINA McCOMBS, in her official capacity as
Superintendent,
LOS ANGELES UNIFIED SCHOOL DISTRICT,
AUSTIN BEUTNER, in his official capacity as
Superintendent,
SAN DIEGO UNIFIED SCHOOL DISTRICT,
DR. LAMONT A. JACKSON, in his official capacity
as Superintendent, and
CINDY MARTEN, in her official capacity as former
Superintendent,
WAKE COUNTY PUBLIC SCHOOL DISTRICT,

CATHY QUIROZ MOORE, in her official capacity as
Superintendent,
AUSTIN INDEPENDENT PUBLIC SCHOOL DISTRICT,
STEPHANIE S. ELIZALDE, in her official capacity as
Superintendent,

Defendants.

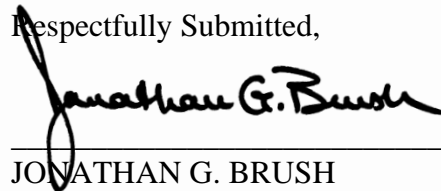
**MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, JONATHAN G. BRUSH hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for DEFENDANTS AUSTIN INDEPENDENT SCHOOL DISTRICT and STEPHANIE S. ELIZALDE in the above-captioned action.

I am in good standing with the State Bar of Texas and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: February 24, 2022

Respectfully Submitted,



JONATHAN G. BRUSH
ROGERS, MORRIS & GROVER, L.L.P.
5718 Westheimer Road, Suite 1200
Houston, Texas 77057
Telephone: 713-960-6000
Facsimile: 713-960-6025
Email: jbrush@rmgllp.com

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Defendants.


AFFIDAVIT OF JONATHAN G. BRUSH

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

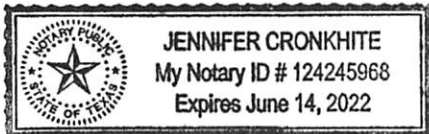
BEFORE ME, the undersigned authority, personally appeared JONATHAN G. BRUSH, known to me to be the person whose name is subscribed to this Affidavit, and who, upon first being duly sworn by me, did under oath depose and say:

1. My name is Jonathan G. Brush. I am over 21 years of age and have never been convicted of a felony.
2. I am an attorney practicing law in Harris County, Texas. I have never been censured, suspended, disbarred or denied admission or readmission to any Court. I have not had any disciplinary proceedings presently against myself.
3. I am of sound mind and I am fully competent to give this affidavit under oath. The facts contained within this affidavit are within my personal knowledge.

Further Affiant sayeth not.


Jonathan G. Brush

SUBSCRIBED and SWORN TO before me by the said Jonathan G. Brush on February 24, 2022.




Notary Public in and for the State of Texas

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Jonathan Griffin Brush

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 5th day of November, 2004.

I further certify that the records of this office show that, as of this date

Jonathan Griffin Brush

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 24th day of February, 2022.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 1675C.1

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

February 24, 2022

Re: Mr. Jonathan Griffin Brush, State Bar Number 24045576

To Whom It May Concern:

This is to certify that Mr. Jonathan Griffin Brush was licensed to practice law in Texas on November 05, 2004, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing
Chief Disciplinary Counsel
SW/web

